

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT COURT OF MASSACHUSETTS**

Ina Steiner  
David Steiner  
Steiner Associates, LLC

Plaintiffs

vs.

eBay, Inc., et al.,

Defendants

CASE NO: 1:21-cv-11181-DPW

**ASSENTED TO MOTION TO REDACT NAMES OF WITNESSES IN PLAINTIFFS’  
INITIAL DISCLOSURES**

Now come the Plaintiffs and respectfully request that this Court permit the parties to redact the names of Plaintiffs’ friends, family and sources listed in Plaintiffs’ Initial Disclosures, filed as exhibits to Defendant eBay’s Motion to Compel. In support thereof, the Plaintiffs state the following:

1. Defendant eBay filed a Motion to Compel Plaintiffs Initial Disclosures, and attached three versions of Plaintiffs’ Initial Disclosures. The motion and attachments were filed under seal.
2. On February 1, 2024, this Court allowed Defendant eBay’s motion to compel, in part, and ordered the Motion to Compel unsealed except for witness contact information.
3. Plaintiffs remain concerned about placing witness names on the public docket. Defendant eBay and all other Defendants have no objection to redacting all witness names from the

Initial Disclosures. Plaintiffs, however, seek only to redact the names of their family, friends and sources.

Wherefore, the Plaintiffs request that this Court permit the parties to redact the Plaintiffs' friends, family and sources from the Initial Disclosures filed as Exhibits A, C and E to Defendant eBay's Motion to Compel, Docket No. 318.

Respectfully submitted,  
INA AND DAVID STEINER  
By their attorneys,

/s/ Rosemary Curran Scapicchio  
Rosemary C. Scapicchio, BBO No. 558312  
Law Office of Rosemary Scapicchio  
107 Union Wharf  
Boston, MA 02109  
617.263.7400  
[Rosemary@Scapicchiolaw.com](mailto:Rosemary@Scapicchiolaw.com)

Respectfully submitted,  
STEINER ASSOCIATES, LLC  
By its attorney,

/s/ Jillise McDonough  
Jillise McDonough, BBO No. 688694  
Law Office of Jillise McDonough  
107 Union Wharf  
Boston, MA 02109  
617.263.7400  
[Jillise@Scapicchiolaw.com](mailto:Jillise@Scapicchiolaw.com)

DATED: February 6, 2024

**CERTIFICATION PURSUANT TO L.R. 7.1(a)(2)**

Pursuant to Local Rule 7.1(a)(2), the undersigned counsel certifies that counsel for Plaintiffs conferred with the Defendants and none of the Defendants object.

Dated: February 6, 2024

Signed: /s/ Rosemary Scapicchio

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each party and upon any party appearing pro se by complying with this Court's directives on electronic filing.

Dated: February 6, 2024

Signed: /s/ Rosemary Curran Scapicchio